

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----x Docket No.: 1:17-cv-01007  
CORAL REALTY, LLC, and CORAL  
CRYSTAL, LLC et al.,

Plaintiffs,

STATEMENT OF OMITTED  
INFORMATION PURSUANT TO  
LOCAL CIVIL RULE 81.1

-against-

FEDERAL INSURANCE COMPANY,

Defendant.

-----x  
Plaintiffs as and for their statement of omitted  
information set forth the following:

1. CORAL REALTY, LLC is owned as follows:

80.883% by Alex Forkosh (NY)

18.17% by MLSF 2000, LLC<sup>1</sup> (NY)

1% by Corigin Holdings LLC (Delaware)

2. CORAL CRYSTAL, LLC is owned as follows:

99% by Coral Realty, LLC (NY)

1% by Coral Crystal Manager Corp<sup>2</sup> (NY)

Dated: New York, New York  
February 15, 2017

WILKOFISKY, FRIEDMAN,  
KAREL & CUMMINS

By: 

DAVID B. KAREL  
Attorneys for Plaintiffs (3465)  
299 Broadway, Suite 1700  
New York, New York 10007  
(212) 285-0510

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<sup>1</sup>

Owned 90% by Alex Forkosh and 10% by MLS 2000 Real Estate Trust

<sup>2</sup>Owned 100% by Alex Forkosh

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----x Docket No.: 1:17-cv-01007  
CORAL REALTY, LLC, and CORAL  
CRYSTAL, LLC et al.,

Plaintiffs,

-against-

FEDERAL INSURANCE COMPANY,

Defendant.

-----x  
Plaintiffs as and for their supplemental statement of  
omitted information set forth the following as for Plaintiffs  
and their respective states of citizenship as of the date  
Plaintiffs' complaint was filed:

1. As and for the members of Corigin Holdings LLC,  
Plaintiffs have no access to such information.

2. The members and shareholders of MLS 2000 Real Estate  
Trust are as follows:

Michelle Podolsky, New York;

Lucie Podolsky, New York;

Steven Forkosh, New York.

3. The trustees of MLS 2000 Real Estate Trust are as  
follows:

Andrew Albstein, New York;

Cris Alcamo, Pennsylvania.

Dated: New York, New York  
February 28, 2017

By: WILKORSKY, FRIEDMAN,  
KAREL & CUMMINS  
DAVID B. KAREL  
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299 Broadway, Suite 1700  
New York, New York 10007  
(212) 285-0510

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----X  
CORAL REALTY, LLC, et al.,

Plaintiffs,

v.

Civil Action No.:  
17-cv-01007-DAB

FEDERAL INSURANCE COMPANY,

Defendant.

Judge Deborah A. Batts

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**DECLARATION OF SCOTT D. SIMON  
IN RESPONSE TO SUBPOENA ON CORIGIN HOLDINGS LLC**

SCOTT D. SIMON, under penalty of perjury pursuant to 28 U.S.C. § 1746, declares as follows:

1. I am an attorney with the law firm Goetz Fitzpatrick LLP, counsel for Corigin Holdings LLC (“Corigin”).

2. I submit this declaration in response to a subpoena dated August 16, 2018 that was served upon Corigin by Federal Insurance Company, the defendant in the above-captioned action (“Subpoena”).

3. The Subpoena seeks the citizenship of Corigin’s members because Corigin is a member of Coral Realty, LLC, a plaintiff in the above-captioned action.

4. Corigin is comprised of two members: one natural person (“Member A”) and one trust (“Member B”). A trust’s citizenship is determined by the citizenship of both the trustee and the beneficiaries. *See Mills 2011 LLC v. Synovus Bank*, 921 F.Supp.2d 219 (S.D.N.Y.2013).

5. Member A is a citizen of the state of New York.

6. Member B is comprised of a trustee and three beneficiaries ("Beneficiary A," "Beneficiary B" and "Beneficiary C").

7. The trustee is a natural person and a citizen of the state of New York.

8. Beneficiaries A and B are natural persons and citizens of the state of New York.

9. Beneficiary C is a natural person and a citizen of the state of California.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on September 21, 2018.

By:



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